

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

ALBERTO PARRA, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

Case No. 1:17-cv-00474-JB-JHR

MVCI ENERGY SERVICES, INC., KELLY
McCLELLAN, GREG VICK, and CHUCK BANKS,

Defendants.

UNOPPOSED MOTION TO WITHDRAW

Pursuant to D.N.M.LR-Civ. 83.8, the law firm of Rodey, Dickason, Sloan, Akin & Robb, P.A. (“Rodey Firm”), hereby moves the Court for an Order allowing it to withdraw as counsel of record from the representation of Defendants MVCI Energy Services, Inc. (“MVCI”), Kelly McClellan, Greg Vick, and Chuck Banks (collectively “Defendants”), in this matter. As grounds for this motion, the Rodey Firm states:

1. There are no pending deadlines in this case as it has been stayed until November 1, 2017 in order to provide time for mediation of Plaintiffs’ claims;
2. Defendants still desire to pursue mediation with their replacement counsel;
3. Defendants are working to secure replacement counsel and reschedule the mediation;
4. Withdrawal can be accomplished without material adverse effect on the interests of Defendants or Plaintiffs; and
5. Neither Defendants nor Plaintiffs’ counsel oppose this motion.

MVCI has been informed that, as a corporate entity, it must be represented by counsel in this action. Pending engagement of replacement counsel, MVCI can be reached at 3204 Southside River Rd Farmington, NM 87401, (505) 325-5320.

Respectfully submitted,

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By /s/ Thomas L. Stahl

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2017, I filed the foregoing pleading electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing and emailed a copy of this pleading to Defendants.

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By /s/ Thomas L. Stahl

Thomas L. Stahl